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April 3, 2020

VIA ELECTRONIC FILING

Magistrate Judge Joel Schneider
United States District Court
District of New Jersey
Mitchell H. Cohen Building & US Courthouse
4th & Cooper Streets, Courtroom 3C
Camden, NJ 08101

Re: Richard McBride, et al. v. Kline Construction Co., Inc.
Case No.: 1:19-cv-14275-NLH-JS
Telephonic Hearing Scheduled for April 8, 2020

Dear Judge Schneider:

We represent the individual defendants Edward Kline and Katherine Kline Penate in this case. Ms. Penate filed a chapter 7 voluntary bankruptcy in the United States Bankruptcy Court for the District of New Jersey on February 19, 2020, Case No. 20-12777. I am advised by bankruptcy counsel for Mr. Kline that he is expected to file a bankruptcy case in the next several days, when original signatures are delivered. Considering the automatic stay of proceeding against Ms. Penate and the imminent bankruptcy filing by Mr. Kline, I am requesting a brief adjournment as to Mr. Kline.

Your Honor's consideration of this request is appreciated.

Respectfully yours,

/s/ Carol Ann Slocum
Carol Ann Slocum

CAS/lac

cc: (all by e-mail)

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